

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIMINAL NO. 21-CR-30028-MGM
BENJAMIN SHACAR,)	
)	
)	
Defendant.)	
)	
)	

**DEFENDANT’S ASSENTED TO MOTION TO CLARIFY AND/OR MODIFY
CONDITIONS OF PRE-TRIAL RELEASE**

Now comes the defendant, Benjamin Shacar, who moves this Honorable Court for an order to clarify his conditions of release, issued by this Court on March 31, 2021, or, in the alternative, modifying said conditions as they pertain to monitoring the defendant.

As grounds therefore, counsel for the defendant states that he was recently notified by the probation officer assigned to this case that the probation office discovered a discrepancy between the release conditions contained in the order of March 31, 2021 which set conditions of release (Docket Entry # 12) and the manner in which both the defendant and probation have interpreted that order. The order of conditions indicates a home confinement requirement while both the defendant and probation have understood the condition to be a 7:00 p.m. to 7:00 a.m. curfew with location monitoring and then subsequently, GPS monitoring, since the order was issued.

As the defendant has complied with the terms of a curfew and GPS monitoring for over three years without any incidents of non-compliance, he respectfully requests that the Court modify the order of release conditions to a curfew of 7:00 p.m. to 7:00 a.m. with GPS monitoring.

Counsel has discussed this matter with the defendant’s supervising probation officer who does not object to the allowance of this motion. The government has not indicated its position on this motion.

Wherefore, Mr. Shacar respectfully requests that this Honorable Court modify his conditions of pre-trial release regarding curfew and monitoring.

Dated: January 24, 2024

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil

WILLIAM J. O'NEIL

Attorney for the Defendant

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CERTIFICATE OF SERVICE

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date January 24, 2024.

/s/ William J. O'Neil

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